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April 15, 2004

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: MobileTel, LLC  
CC Docket No. 94-102  
E911 Phase II Interim Implementation Report

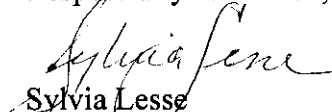
Dear Ms Dortch:

Pursuant to the Commission's Order to Stay,<sup>1</sup> MobileTel, LLC ("MobileTel") hereby submits its E911 Phase II Interim Implementation Report to assist the Commission in monitoring the company's progress in deploying Phase II E911 technology.

MobileTel reiterates its request for waiver of Section 20.18(d) of the Commission's Rules (filed August 1, 2003). As indicated by the additional information provided herein, the public interest will be served by grant of the requested relief.

Please contact the undersigned if you have any questions regarding this report.

Respectfully submitted,



Sylvia Lesse  
Counsel for MobileTel, LLC

Enclosure

cc: John Muleta, Chief, Wireless Telecommunications Bureau  
David Solomon, Chief, Enforcement Bureau  
D'wana Terry, Chief, Public Safety & Critical Infrastructure Division  
Eugenie Barton, Public Safety & Critical Infrastructure Division  
Qualex International

<sup>1</sup> See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers: Order to Stay*, CC Docket No. 94-102 at para. 30 (rel. Oct. 10, 2003) ("Order to Stay").

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**MOBILETEL, LLC**  
**E911 PHASE II INTERIM IMPLEMENTATION REPORT**  
**FOR TIER III CARRIERS**  
**First Quarter, 2004**

MobileTel, LLC ("MobileTel" or "Company"), pursuant to the Commission's Order to Stay,<sup>1</sup> hereby provides an interim report to assist the Commission in monitoring MobileTel's progress in deploying Phase II E911 technology.<sup>2</sup>

**I. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):**

MobileTel's status with respect to Phase I and Phase II requests from PSAPs remains unchanged. MobileTel has received valid Phase I requests from Lafourche, St. Mary and Terrebonne parishes and provides Phase I service to these parishes. The Company has not received a Phase I request from the other jurisdiction that the Company serves, Grand Isle. MobileTel has not received a Phase II request from any of the jurisdictions.<sup>3</sup>

**II. The carrier's specific technology choice:**

As reported, the Company has determined that a network-based Phase II solution is not economically or technically feasible. Accordingly, the Company is converting its analog/TDMA system to a CDMA network that supports a handset-based solution.<sup>4</sup>

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<sup>1</sup> See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers: Order to Stay*, CC Docket No. 94-102 at para. 30 (rel. Oct. 10, 2003) ("Order to Stay").

<sup>2</sup> On August 1, 2003, MobileTel requested a limited and temporary waiver of the Commission's Phase II obligations ("Petition") and filed an E911 Phase II Interim Report for Tier III Carriers ("First Report"). In its Petition, MobileTel committed to providing quarterly progress reports. On November 10, 2003, MobileTel supplemented the Petition with updated information to further substantiate its request. See Supplement to Petition for Waiver of Section 20.18 of the Commission's Rules, CC Docket No. 94-102, filed Nov. 10, 2003 ("Supplement"), and filed a quarterly report on January 15, 2004. Accordingly, this instant report serves as the Company's third quarterly progress report.

<sup>3</sup> In the Petition and subsequent reports, MobileTel informed the Commission that one of the PSAPs in MobileTel's area is constructing a new facility and had informed the Company that "it does not plan to have the new facility operational for at least a year." Petition at 7, n.17; First Report at 2, n.4. As reported in January, 2004, plans to construct a new facility have been cancelled and the PSAP is proceeding with upgrading its current facilities. MobileTel understands, however, that a Phase II request will not be issued until the upgrades have been completed, which is expected to occur during the third quarter, 2004.

<sup>4</sup> The Company reports that its active negotiations with Intrado have resulted in a proposed Phase I and Phase II CDMA solution which can be finalized, pending action on the Company's analog/TDMA waiver request.

### III. Status on ordering and/or installing necessary network equipment:

As previously reported, the Company has made significant progress in converting its system to CDMA.<sup>5</sup> The Company continues to report that it remains on schedule to begin marketing CDMA service in the majority of its service area by late 2004 and plans to have a complete overlay of its existing analog/TDMA system in approximately April 2005.

In anticipation of completion of the conversion of its network to CDMA, MobileTel has initiated the development of a subscriber educational campaign to encourage analog/TDMA customers to transition to CDMA ALI-capable phones. Through these efforts, the Company anticipates that most of its customers will have migrated to CDMA ALI-capable phones by the end of 2007. MobileTel hereby provides further details regarding this campaign:

1. Continuation of on-going efforts to transition customers from analog to digital.  
As part of MobileTel's existing marketing efforts, the Company seeks to convert its analog customers to digital technologies. Among the activities directed toward this goal are continuations of programs previously reported: (1) Company representatives encouraging analog customers to switch to digital when the customers call in to discuss issues related to their service; and (2) pricing digital calling plans lower than analog plans. In addition, the company reports two additional efforts undertaken this quarter: (1) initiation of an active "trade up" marketing campaign, focused on analog phones (utilizing the slogan, "trade in that clunky old phone"); and (2) a focused outbound phone campaign designed to educate existing analog users and to promote a transition to digital technologies. These efforts have resulted in an additional one percent reduction of analog users over the past three month period.<sup>6</sup>
2. Marketing Campaign  
As noted above, MobileTel has already undertaken an active marketing plan designed to move existing analog subscribers to TDMA. The Company intends to continue that effort in the coming months. After the CDMA system has been fully deployed in 2005, the Company will initiate a marketing campaign which continues to target its analog and TDMA customers with direct mailings and print advertising. The marketing efforts would emphasize that location information will not be available to emergency service providers unless the customers transition to CDMA ALI-capable phones. Customers that still have analog handsets will continue to be the subject of specific and targeted efforts emphasizing the additional benefits of digital service.

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<sup>5</sup> See Supplement at 2.

<sup>6</sup> The Company hereby reports an error in its January, 2004 calculation of the percentage of customers then utilizing analog technology. The correct percentage of analog users on a system-wide basis as of December 31, 2003 was 11.71%, rather than the reported 8.14%. Nonetheless, this was a significant reduction from the 17.65% that existed as of December 31, 2002. The one percent decrease over the past three months yields a current total of 10.26% of all customers currently utilizing analog technology.

3. Incentives to Convert to CDMA ALI-Capable Phones

Consideration is also being given to providing a rebate or other benefit to customers who turn in their analog or TDMA handset and purchase a CDMA phone. The Company plans to cease sales of analog phones to the general public once the CDMA network is fully deployed and tested.<sup>7</sup>

**IV. Information Regarding Availability of ALI-Capable Handsets**

Because MobileTel does not plan to begin marketing its CDMA service until late 2004, it has not begun ordering CDMA ALI-capable handsets. MobileTel is aware, however, that ALI-capable handsets are available for CDMA networks and anticipates that more models will be available when it begins to actively market CDMA phones.

**V. The estimated date on which Phase II service will first be available in the carrier's network:**

MobileTel continues to report that the anticipated date that it will begin selling and activating ALI-capable CDMA is January 1, 2005. MobileTel has been coordinating with the PSAPs in its service area regarding their plans to begin receiving Phase II information and does not anticipate that any PSAP will require the Phase II information until after the Company has fully implemented its CDMA technology.

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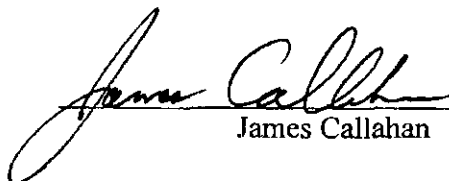
<sup>7</sup> The Company may continue to sell analog phones to public safety officials who may require the larger coverage area that analog provides and to those who use the phones off-shore where there is no digital service.



### DECLARATION OF JAMES CALLAHAN

I, James Callahan, President of MobileTel, LLC, do hereby declare under penalty of perjury that I have read the foregoing "E911 Phase II Interim Implementation Report for Tier III Carriers, First Quarter 2004" and confirm that the facts stated therein are true and correct, to the best of my knowledge, information and belief.

*April 14, 2004*  
Date

  
James Callahan

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